

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

JAMES HAINY

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Brady A. MUSGRAVE

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for a Civil Case**

Case No. \_\_\_\_\_  
*(to be filled in by the Clerk's Office)*

**REQUEST FOR TRIAL BY JURY**

Plaintiff requests trial by jury. ☒ Yes ☐ No

## I. The Parties to This Complaint

### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	James Hajny 26846-045
Street Address	450 Terrace Haute P.O. Box 33
City and County	Terre Haute Vigo County
State and Zip Code	Indiana 47808
Telephone Number	N/A
E-mail Address	N/A

### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

#### Defendant No. 1

Name	Brady A. Musgrave
Job or Title (if known)	Attorney
Street Address	400 E. Walnut St # 130
City and County	Springfield Greene
State and Zip Code	Missouri 65806
Telephone Number	417-866-0110
E-mail Address (if known)	bradymusgrave law@gmail.com

#### Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_  
(if known)

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. *(Check all that apply)*

☒ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The 5th & 6th Amendments to the Constitution of  
the United States

☐ Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

☐ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

### A. The Plaintiff(s)

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State  
of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation Jones & Musgrave LLC

The defendant, (name) Becky A. Musgrave, is incorporated under the laws of the State of (name) Missouri, and has its principal place of business in the State of (name) Missouri. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

C. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain):

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III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?

- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

*see Attached sheets*

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#### IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

*I am asking for damages & punitive damages in the amount of \$ 500,000,000.00 (5 hundred million dollars).*

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Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☐

No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒

No ☐

Do you claim punitive monetary damages?

Yes ☒

No ☐

## Attachment

### Complaint # 1

When Mr. Musgrave received the discovery from AUSA Carnay in January 2015 along with the indictment handed down by the grand jury, he allowed my rights to be violated by the government by allowing the indictment to stand instead of motioning the Court for a dismissal. The indictment was and still is Constitutionally Flawed. The indictment handed down in June 2014, and the superseding indictment in July 2014 give no facts, there is nothing in the indictment to which explains how I violated the statutes I supposedly was charged with in May 2014. I had only learned about this violation in 2019.

### Complaint # 2

Between January 2015 - October 2015, Mr. Musgrave continually lied to me. He continually assured me that he was in fact having specific evidence examined by a forensic expert at my request. He also on August 24, 2015 lied to the Court when he requested a continuance so he could have evidence examined at my request. This lie was admitted to by himself in open Court on November 19, 2015 in front of Magistrate Judge David P. Rush.

Mr. Musgrave violated my 6th Amendment rights by denying me the 5th right to challenge any and all evidence to which the government had intended to use against me at trial. Mr. Musgrave also violated the Criminal Justice Act, as he failed to provide me with adequate representation to which is required under the act.

When Confronted by the Court for his actions, Mr. Musgrave stated his reason, "was because he believed the Police to be more honest than his client." The hearing concluded with him being removed as my attorney but with no disciplinary action to follow.

### Complaint #3

On or about March 15, 2019, I sent Mr. Musgrave a letter requesting my complete client file with all discovery documents printed out, minus any photographs which may be deemed illegal to possess. Instead of receiving the documents to which he was required to send as the file is my property, emailed the AUSA Mr. Carney in turn forwarded the email to Ami Miller, she in turn told him "Do not give him anything, including discovery."

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$500,000.00. I'm claiming these due to the Constitutional  
Violations and the malice inflicted by the defendant.

#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Plaintiff

Printed Name of Plaintiff

James Hajny  
James Hajny



James Hays 2646-045  
USO Terre Haute  
P.O. Box 33  
Terre Haute, In. 47808

Legal  
Mail

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INMATE  
IDENTIFICATION  
CONFIRMED

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29 SEP 2020 PM 6 L



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MO  
KANSAS CITY, MO

United States District Court  
Western District of Missouri  
400 East Street Rm 7452  
Kansas City, Mo 64106

Affirm-  
Clerks Office

Legal Filings

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